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*Attorneys for Defendants*  
*Estes Express Lines and Scottie Thompson*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Estate of AXEL MORAN, deceased, by  
YOLANDA NOVOTNY, as Executrix of the  
Estate,

Plaintiff,

v.

SCOTTIE THOMPSON; ESTES EXPRESS  
LINES; STEVEN MAGAN; ILKHAM  
AKHMEDOV; M&R TRANSPORT LLC;  
JOHN DOES 1-10 (said names being  
fictitious names, real names unknown); and  
ABC COMPANIES 1-10 (said names being  
fictitious, real names unknown)

Defendants.

Civil Action No. 2:18-cv-10128

**CERTIFICATION OF JANICE  
BEACHAM IN SUPPORT OF ESTES  
DEFENDANTS' MOTION TO DISMISS**

**Return Date: Monday, August 6, 2018**

I, **JANICE BEACHAM**, certify as follows:

1. I am the Director, Risk Management for Defendant Estes Express Lines ("Estes"). I am providing this Certification in support of Defendants Scottie Thompson ("Mr. Thompson") and Estes (collectively, "Estes Defendants") Motion to Dismiss Plaintiff's Complaint for Lack of Personal Jurisdiction, or in the alternative, for Improper Venue. I have personal knowledge of the following facts.

2. Estes is a citizen of the Commonwealth of Virginia, where it is incorporated and where it has its principal place of business at 3901 West Broad Street, Richmond, Virginia 23230.

3. Estes was served with, and first received notice of, Plaintiff's Complaint on May 15, 2018. Estes was served with Plaintiff's Complaint at its Morrisville, North Carolina terminal. (A true and complete copy of an Affidavit of Service is attached hereto as Exhibit 1.)

4. Estes is in the transportation business and offers a spectrum of shipping and supply chain management services.

5. Estes operates throughout the domestic and offshore United States and Internationally. Within the domestic and offshore United States, Estes has over 200 terminals located in the following States: Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, and Wisconsin.

6. While Estes's terminals maintain records, these records are then sent/forwarded to Estes's headquarters in Virginia. All risk management functions report into me in Virginia.

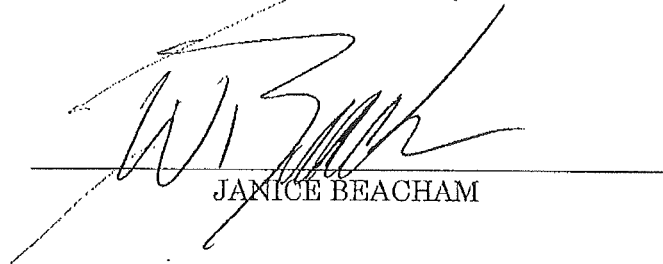
7. In New Jersey, Estes operates and maintains five terminals: North Bergen, South Plainfield, Jersey City, Lakewood and Pine Brook. Its five terminals in New Jersey account for only 2.5% of its total number of terminals throughout the domestic and offshore United States.

8. Estes' trucks are registered in the State of North Carolina and inspected annually under the laws and regulations of North Carolina. The truck involved in the accident in this case is registered in North Carolina.

9. As of the date of this motion, Estes employs approximately 245 workers in New Jersey which accounts for approximately 1.42% of its total workforce of approximately 17,249 individuals throughout the domestic and offshore United States.

10. Estes has generated less than 1.382% of its total revenue in New Jersey.

I declare under penalty of perjury under the laws of the United States and the State of Virginia that the foregoing is true and correct, to the best of my knowledge.



JANICE BEACHAM

Dated: June 22, 2018

# **EXHIBIT 1**

ESTATE OF AXEL MORAN, DECEASED,  
BY YOLANDA NOVOTNY AS EXECUTRIX  
OF THE ESTATE

Plaintiff

vs.

SCOTTIE THOMPSON, ET AL

Defendant

Superior Court of New Jersey  
Law Division  
Essex County  
Docket Number: ESX-L-003105-18

**Person to be served (Name & Address):**

ESTES EXPRESS LINES  
6848 MOUNT HERMAN ROAD  
MORRISVILLE, NC 27560

**AFFIDAVIT OF SERVICE**

(For Use by Private Service)

**Attorney:**

John M Vlasac, Jr.

Cost of Service pursuant to R. 4:4-3(c)

\$ \_\_\_\_\_

**Papers Served:** Summons, Complaint, Jury Demand, Notice Of Designation of Trial Counsel, Certification Pursuant To Rule 4:5-1, CIS, Track Assignment Notice and Lawyers Referral List

**Service Data:**

Served Successfully ☒ Not Served \_\_\_\_\_ Date: 5/15/2018 Time: 1:40 pm Attempts: \_\_\_\_\_

\_\_\_\_\_ Delivered a copy to him / her personally

Name of Person Served and relationship / title:

\_\_\_\_\_ Left a copy with a competent household member over 14 years of age residing therein

RICK HEDINGER

☒ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc.

AGENT/ MANAGING AGENT

**Description of Person Accepting Service:**

Sex: M Age: 50 Height: 6' Weight: 200 Skin Color: WHITE

Hair Color: BLACK

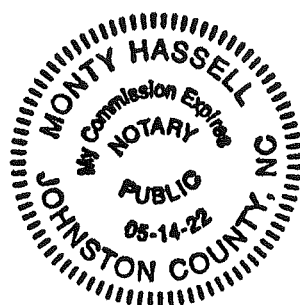
**Comments or Remarks:**

**Server Data:**

Subscribed and Sworn to before me on 05-14 2018  
by the affiant who is personally known to me.

Monty Hassell  
NOTARY PUBLIC

Johnston Co  
05-14-22



I, CHRISTOPHER J. CHRISTIANO, was at the time of service a competent adult not having a direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Signature of Process Server

Date

5/16/18  
STATUS, L.L.C.  
1509 Stuyvesant Avenue  
Union, NJ 07083  
(908) 688-1414  
Our Job Serial Number: STS-2018020586  
Ref: NA